

DEPARTMENT OF THE NAVY

SOUTHIVEST DIVISION MAYAL FACILITIES ENGINEERING COMMAND 1220 PACIFIC HIGHWAY SAN DIEGO, GA 92132 - 5193 AR_M60050_004777 MCAS EL TORO SSIC NO. 5090.3.A

5090 Ser 06CC.AP/1603 December 23, 2003

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Mr. John Broderick Remedial Project Manager California Regional Water Quality Control Board 3737 Main Street, Suite 500 Riverside, CA 92501-3339

Fellow Federal Facility Agreement (FFA) Representatives:

SUBJECT: DRAFT FINAL TECHNICAL MEMORANDUM, SUMMARY REPORT, APHO 46 AND MSC R2, FORMER MARINE CORPS AIR STATION EL TORO, CALIFORNIA

Submitted for your review is the *Draft Final Technical Memorandum*, *Summary Report*, *APHO 46 and MSC R2*, *Former Marine Corps Air Station El Toro*, *California*. This Technical Memorandum presents the results of an investigation of Aerial Photograph Anomaly (APHO) 46 and Miscellaneous Refuse Area 2 (MSC R2) at the former Marine Corps Air Station (MCAS), El Toro, California. The investigation of these two areas was conducted as part of the pre-design investigation of Installation Restoration Program (IRP) Sites 3 and 5 and was completed in accordance with the *Final Work Plan*, *Pre-Design Investigation*, *Operable Unit 2C*, *Landfill Sites 3 and 5*, *Former Marine Corps Air Station*, *El Toro*, *California* (July 2002) and *Final Sampling and Analysis Plan*, *Amendment Number 1*, *Pre-Design Investigation*, *Operable Unit 2C*, *Landfill Sites 3 and 5*, *Former Marine Corps Air Station*, *El Toro*, *California* (October 2003).

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Soil sampling was conducted at APHO 46 in August 2002 in accordance with the sampling design proposed in the Pre-Design Investigation Work Plan (July 2002). The analytical results obtained during the soil investigation along with risk screening results were presented in the *Draft Technical Memorandum*, *Summary Report*, *APHO 46 and MSCR 2*, *Former Marine Corps Air Station*, *El Toro*, *California* (January 2003), and were submitted to the U.S. Environmental Protection Agency (EPA), California Department of Toxic Substances Control (DTSC), and California Regional Water Quality Control Board, Santa Ana Region (CRWQCB), for review. Following comments by the DTSC (dated 13 February 2003), EPA (25 February 2003), and CRWQCB (1 May 2003), and discussions during our meetings on 28 May and 16 June, 2003, regarding the detection of dioxins and furans in all soil samples collected at the site, the Navy agreed to conduct an additional investigation to complete the characterization of APHO 46. The enclosed Draft Final Technical Memorandum incorporates the results of the additional investigation conducted at APHO 46 in September 2003 to address the comments of our fellow FFA Representatives.

We believe that based on the additional data found in the report that concludes that APHO 46 has been characterized adequately and represents a risk to human health that is well within the EPA-established risk management decision range of 10⁻⁶ to 10⁻⁴, the regulatory agencies will concur with the Navy recommendation for no further investigation pending the results of the radiological assessment. We also believe that based on the conclusion that there is no evidence of waste placement or landfill activities at MSC R2, the agencies will concur with the no further investigation recommendation at this site.

The enclosed Draft Final Technical Memorandum is a supporting document that will advance the Site 3 and 5 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) program. We anticipate that your review of and concurrence with this document should proceed efficiently given the detail of prior discussions regarding sampling at APHO 46. Please provide any comments or your concurrence by **Friday, January 30, 2004**.

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Thank you for your continued support in this program. Should you have questions or need additional information, please contact Mr. Karnig Ohannessian, Remedial Project Manager, at (619) 532-0796 or me at (619) 532-0784.

Sincerely,

F. ANDREW PISZKIN

Base Realignment and Closure Environmental Coordinator By direction of the Commander

Enclosure: 1. Draft Final Technical Memorandum, Summary Report, APHO 46 and MSC R2, Former MCAS El Toro, California – Dated December 2003

SENSITIVE RECORD

PORTIONS OF THIS RECORD ARE CONSIDERED SENSITIVE AND ARE NOT AVAILABLE FOR PUBLIC VIEWING

ADDRESS OF PRIVATE CITIZEN

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SENSITIVE

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ENCLOSURE

DRAFT TECHNICAL MEMORANDUM SUMMARY REPORT APHO 46 AND MSC R2

DATED 01 DECEMBER 2003

THIS RECORD IS ENTERED IN THE DATABASE AND FILED AS

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